

# **Exhibit H**

[COURT]

<p>_____, Plaintiffs,  v.  _____, Defendant.</p>	<p>CIVIL ACTION NO.  JUDGE _____</p>
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**STIPULATION AND [PROPOSED] ORDER  
JOINTLY REQUESTING STAY AS TO TRAVELERS**

Plaintiffs \_\_\_\_\_ (“Plaintiffs”) and defendant [Travelers entitiy/ies] (“Travelers”) hereby agree and stipulate through counsel as follows:

**I. RECITALS**

1. Plaintiffs, by this and other filed actions (the “Filed Actions”), have asserted claims against Travelers and other defendants, alleging that Travelers and others mishandled claims arising out of Hurricanes Katrina and/or Rita, thereby allegedly causing Plaintiffs to receive fewer benefits than those to which they were entitled;

2. Travelers disputes these asserted claims and denies any wrongdoing or liability whatsoever;

3. Plaintiffs and Travelers now desire to settle this and the other Filed Actions;

4. After an extended period of arms-length negotiation, on \_\_\_\_\_, 2009, Plaintiffs and Travelers entered into a Settlement Agreement and Release with respect to this and the other Filed Actions;

5. Pursuant to that agreement, on \_\_\_\_\_, 2009, Plaintiffs filed a complaint in *Arthur v. Travelers*, in the United States District Court for the Eastern District of Louisiana, Civil

No. \_\_\_\_\_, which sets forth in one complaint the claims of all plaintiffs in the various Filed Actions;

6. The Settlement Agreement and Release also provides for entry of a Final Order and Judgment approving the settlement, following a Final Approval Hearing.

7. On \_\_\_\_\_, 2009, the parties filed a Joint Motion Seeking Entry of Preliminary Approval Order requesting, *inter alia*, that the settlement be approved, a settlement class be certified, and the court set a date for a Final Approval Hearing;

8. Following the entry of the Final Order and Judgment approving the settlement in the Eastern District of Louisiana, Plaintiffs intend to submit to this Court a Notice of Dismissal as to Travelers;

9. As a result of the foregoing, the parties do not anticipate that Plaintiffs or Travelers will seek to prosecute or defend the above-titled action as to the other at this or any future time;

10. Plaintiffs and Travelers now wish to stay the above-titled action as to Travelers for the convenience of the Court and so that no time prescribed by any otherwise applicable rule or order begins or continues to run against Travelers or Plaintiffs, as to each other;

Accordingly, Plaintiff and Travelers agree and stipulate through counsel as follows:

## II. STIPULATION

IT IS HEREBY STIPULATED by and between the Parties that this action be stayed as to Travelers.

Dated: \_\_\_\_\_, 2010

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Dated: \_\_\_\_\_, 2010

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**[PROPOSED] ORDER**

The Court, having considered the foregoing stipulation, and good cause appearing therefore, it IS HEREBY ORDERED that this action be stayed as to Travelers.

Dated:

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THE HONORABLE [NAME]  
[Title]